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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

21 October 2004

Mr. F. Andrew Piszkin BRAC Environmental Coordinator Base Realignment and Closure Marine Corps Air Station El Toro 7040 Trabuco Road Irvine, CA 92618

Subject: Response to Comments on the Draft Site Assessment

Report for IRP Site 16, Former Marine Corps Air Station

El Toro, California

Mr. Piszkin:

The U.S. Environmental Protection Agency (EPA) has reviewed the response to comments dated 21 September 2004. We have determined the responses to be adequate with one exception as discussed below.

EPA Specific Comment 8, Figure 4 TPH in Soil - The original comment raised into question the adequacy of the delineation of the extent of TPHd and TPHg contamination along the northwestern edge of the historic main fire fighting pit. In particular, concern was raised as to the detections in borings IRP16-CB-01 (at 5 feet depth) and IRP16-CB-02 (at 5 and 10 feet depth). The DoN response suggests that the non-detections in borings IRP16-CB-09 and IRP16-CB-17 provide closure of the zone of contamination in this area. However, the analytical data for boring IRP16-CB-09 begin at 20 feet depth while the detections of issue in nearby boring IRP16-CB-02 are at 5 and 10 feet depth. While analytical data for boring IRP16-CB-17 are provided at 5 and 10 feet depth, this boring is located to the southwest of boring IRP16-CB-01. There are no borings located northwest and/or north of boring IRP16-CB-01 to provide closure for the detections at 5 feet depth. Will the refinement characterization work to be performed during implementation of the pilot test (see response to EPA General Comment 5) address this data gap concern?



If you should have any questions regarding this comment, please contact me at 415-972-3349.

Sincerely,

Rich Muza,

Rich Muza,

RPM

Superfund Division

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